

ORIGINAL

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of: ) MM Docket No. 95-31

Reconsideration of the Comparative Standards  
for Noncommercial Applications )

Association of America's Public Television  
Stations' Motion For Stay of Low Power  
Television Auction (No. 81) )

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Commission

**COMMENTS OF THE TRINITY BROADCASTING NETWORK**

The Trinity Christian Center of Santa Ana, Inc., d/b/a the Trinity Broadcasting Network ("Trinity"), by undersigned counsel, provides these comments to the Commission's *Second Further Notice of Proposed Rulemaking*, FCC 02-44, released February 25, 2002 ("*Second Notice*").<sup>1</sup>

**Introduction**

Trinity believes that a "nonprofit educational organization" ("NCE") seeking a commercial, or unrestricted authorization must be afforded an equal, nondiscriminatory opportunity to acquire the authorization when no "educational program" or "service" presentation

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<sup>1</sup> Trinity and its affiliated organizations, including noncommercial television licensees Community Educational Television, Inc., Jacksonville Educators Broadcasting, Inc., and San Antonio Community Educational Television, Inc. (formerly Hispanic Community Educational TV, Inc.), hold 22 full-power commercial and 6 noncommercial television station licenses, and over 230 translator and low power television facilities, as listed in Attachment 1. Trinity also has numerous applications pending in Auction 81.

under Rules 73.503 (for radio) or 73.621 (for TV) is relevant or applicable. Consistent with the Court of Appeals' ruling in *National Public Radio v. FCC*, 254 F.3d 226 (D.C. Cir. 2001), only when an NCE is applying for a commercial authorization to advance the unique service obligations of these educational Rules should it be excluded from obtaining, by competitive bidding or otherwise, a commercial authorization. To do so, and exclude all such NCEs would be to engage in unconstitutional content, viewpoint, and status discrimination.<sup>2</sup>

The FCC's application of the bidding process to exclude NCE entities can not be so narrow as to discriminate against, and uniquely disqualify religious nonprofit (noncommercial) entities from obtaining, on an equal basis, the licenses of commercial frequencies. Any reading or application of the statute to require such an outcome would be unwarranted, and unconstitutional. Religious organizations, including those that may also qualify for an NCE authorization, must not be discriminated against because they are "noncommercial" in their formation, operation, activity and speech, and may otherwise qualify for NCE standing under section 397(6) of the Act. The equal protection and first amendment rights of religious, charitable and educational nonprofit organizations would clearly be violated if the Commission were to apply the statute and the ruling in *NPR v. FCC* so as to preclude them from having equal access to unrestricted (commercial) frequencies where no specification of any particular program service is required or pertinent.

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<sup>2</sup> See, *Good News Club v. Milford*, 121 S. Ct. 2093 (2001)(speech may not be excluded from a limited public forum based on the nature of the speech); *Rosenberger v. Rector and Visitors of Univ. Of Va.*, 515 U.S. 819 (1995)(Free Speech Clause violated when access to forum and government funding discriminates based on viewpoint); and *Lamb's Chapel v. Center Moriches Union Free Sch. Dist.*, 508 U.S. 384 (1993)(Free Speech Clause violated when religious perspective on issues excluded from limited public forum).

This analysis does not restrict the FCC from continuing to limit the eligibility for reserved educational frequencies, which require an NCE to specify a unique educational service under Rules 73.503 and 73.621. But to attempt, in any manner, to preclude nonprofit organizations that might otherwise qualify for consideration as an NCE licensee from also being eligible to obtain and hold commercial frequencies by competitive bidding is unwarranted and, Trinity believes, legally impermissible.

### **Men of Commerce Versus Men of Faith, Education and Charity**

#### **A. NCE Organizations Not Seeking to Advance the Requirements of Rules 73.503 or 73.621 Must be Allowed to Compete for Unreserved Frequencies**

As explained nearly fifty years ago, in *Noe v. FCC*, 260 F.2d 739 (D.C. Cir., 1958), the officers and directors of religious, educational and charitable organizations “are not men of business; they are leaders of a religious community” and the “Commission has always recognized the necessity of distinguishing non-business organizations from the ordinary stock corporation.” At no time, however, has the Commission ever attempted to preclude otherwise qualified entities from obtaining, on an equal basis, commercial, or unrestricted broadcast licenses, and it should not do so now. “[T]he government may not deny a benefit to a person because he exercises a constitutional right.” *Regan v. Taxation With Representation*, 461 U.S. 540, 545 (1983).

It is beyond the need for elaboration that religious organizations provide educational functions and services as well as religious and charitable services. Religious organizations are also qualified to hold NCE licenses. Commission Rule 73.621(c) specifically provides that “noncommercial educational television broadcast stations may transmit educational, cultural and

entertainment programs.”<sup>3</sup> As explained in *Columbia Bible College Broadcasting Company*, 6 FCC Rcd 516 (January 30, 1991) (¶ 9), nonprofit entities may operate noncommercial stations provided “(i) there is an overall educational program proposed for the station; and (ii) the proposed programs evidence a commitment to advance an educational goal.”<sup>4</sup> It makes little sense, and it would be particularly discriminatory to now prevent such religious NCE organizations from being able to qualify to compete for unrestricted (commercial) frequencies simply because they may also be qualified to hold a restricted (educational) license. For this reason, the Commission is constrained to conclude that an NCE organization may participate in an auction for a broadcast license whenever it does not make “a showing that the station will be used for the advancement of an educational program.” *Second Notice* at ¶9. This must be so

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<sup>3</sup> As stated in *Good News*, 121 S. Ct. at 2101:

We disagree that something that is “quintessentially religious” or “decidedly religious in nature” cannot also be characterized properly as the teaching of morals and character development from a particular viewpoint. What matters for purposes of the Free Speech Clause is that we can see no logical difference in kind between the invocation of Christianity by the Club and the invocation of teamwork, loyalty, or patriotism by other associations to provide a foundation for their lessons. It is apparent that the unstated principle of the Court of Appeals’ reasoning is its conclusion that any time religious instruction and prayer are used to discuss morals and character, the discussion is simply not a ‘pure’ discussion of those issues. . . . We, however, have never reached such a conclusion. Instead, we reaffirm our holdings in *Lamb’s Chapel* and *Rosenberger* that speech discussing otherwise permissible subjects cannot be excluded from a limited public forum on the ground that the subject is discussed from a religious viewpoint.

*Id.* at 2102.

<sup>4</sup> In *Columbia Bible College Broadcasting Company*, *supra*, the Commission confirmed that “religiously oriented applicants for reserved ... channels can meet the requisite eligibility standards.” *Id.* at ¶ 9. See also, *Deletion of Noncommercial Reservation Channel 16, Pittsburgh, Pennsylvania*, 3 CR 1141, n. 18 (1996); and *Way of the Cross, Inc.*, 101 FCC2d 1386, 1374 (n.8) (1985).

regardless of how the applicant intends to program and operate the commercial frequency in contest.

As the Supreme Court noted in *Branti v. Finkel*, 445 U.S. 507, 514 (1980):

[the government] may not deny a benefit to a person on a basis that infringes his constitutionally protected interests—especially his interests in freedom of speech. For if the government could deny a benefit to a person because of his constitutionally protected speech or associations, his exercise of those freedoms would in effect be penalized and inhibited. This would allow the government to produce a result which it could not command directly. Such interference with constitutional rights is impermissible.

See also, *Perry v. Sindermann*, 408 U.S. 593, 597 (1972); and *Thomas v. Review Board*, 450 U.S. 707, 716 (1981) ("more than 30 years ago," the Supreme Court "held that a person may not be compelled to choose between the exercise of a First Amendment right and participation in an otherwise available public program"). As the Commission has acknowledged, it "has no authority and, in fact, is barred by the First Amendment and [section 326 of the Communications Act] from interfering with the free exercise of journalistic judgment." *Hubbard Broadcasting, Inc.*, 48 FCC2d 517, 520 (1974). As section 326 of the Communications Act, 47 U.S.C. § 326, succinctly states, "no regulation or condition shall be promulgated or fixed by the Commission which shall interfere with the right of free speech by means of radio communication."

As the Supreme Court further explained in *Turner Broadcasting System v. FCC*, 512 U.S. 622, 649, 114 S.Ct. 2445, 2462 (1994):

In particular, the FCC's oversight responsibilities do not grant it the power to ordain any particular type of programming that must be offered by [unreserved] broadcast stations; for although the Commission may inquire of licensees what they have done to determine the needs of the community they propose to serve, the Commission may not impose upon them its private notions of what the public ought to hear (citations omitted).

Accordingly, any application of the *NPR v. FCC* ruling in such a way as to preclude or disqualify NCE (including religious NCEs) from fairly competing for commercial licenses when there is no showing of or reliance upon presenting a unique educational service under Rules 73.503 and 73.621 would be legally impermissible and must be avoided. The only constitutionally sound interpretation of section 397(6) of the Act, even after *NPR v. FCC*, is to read it as applying only when “a showing that the station will be used for the advancement of an educational program” is involved. Moreover, because applications for commercial frequencies do not require specific program service commitments, no application for such frequencies should be prevented or limited in any way simply because an NCE or nonprofit entity submits the application.

#### **B. Free Speech and Equal Protection Require A Nondiscrimination Standard**

This conclusion is further warranted because the Supreme Court also linked the Free Speech Clause protection with the Equal Protection Clause in *Carey v. Brown*, 447 U.S. 455 (1980):

When government regulation discriminates among speech-related activities . . . the Equal Protection Clause mandates that the legislation be finely tailored to serve substantial state interests, and the justifications offered for any distinctions it draws must be carefully scrutinized.

Id., 447 U.S. at 461-62.

An unequal application of the auction process by which the Commission awards commercial broadcast licenses so as to automatically exclude an NCE organization solely because it is not-for-profit would also lead to the inescapable conclusion that the FCC is improperly discriminating between commercial and noncommercial, or secular and religious

speech. In *Police Department v. Mosley*, 408 U.S. 92 (1972), the Supreme Court relying upon *Carey*, stated in this regard:

Necessarily, then, under the Equal Protection Clause, not to mention the First Amendment itself, government may not grant the use of a forum to people whose views it finds acceptable, but deny use to those wishing to express less favored or more controversial views. And it may not select which issues are worth discussing or debating in public facilities. There is an equality of status in the field of ideas, and government must afford all points of view an equal opportunity to be heard.

*Mosley*, 408 U.S. at 96 (citations and internal quotation marks omitted). Applying different standards to different groups applying for unrestricted, commercial frequencies violates the Equal Protection Clause. It is also obvious that noncommercial, nonprofit organizations provide different messages to viewers and listeners than do commercial, for-profit organizations.

In the context of a religious NCE organization particularly, the Supreme Court has said that instead of discriminatory application of the laws, the government has a "duty to accommodate" religious activities. This would include an accommodation that such organizations operate in a noncommercial, nonprofit legal mode. In *Lynch v. Donnelly*, 465 U.S. 668 (1984), the Supreme Court stated the rule:

[The First Amendment] affirmatively mandates accommodation, not merely tolerance, of all religions, and forbids hostility toward any.

465 U.S. at 673.

In *Hobbie v. Unemployment Appeals Commission*, 480 U.S. 136, 144 (1987), the Supreme Court reiterated that concept:

This Court has long recognized that the government may (and sometimes must) accommodate religious practices and that it may do so without violating the Establishment Clause.

The Supreme Court has also cautioned officials not to use the Establishment Clause as an excuse to justify mistreatment of religious people. In *McDaniel v. Paty*, 435 U.S. 618, 641 (1978), Justice Brennan, in his concurring opinion, said:

The Establishment Clause, properly understood, is a shield against any attempt by government to inhibit religion as it has done here; [citations omitted]. It may not be used as a sword to justify repression of religion or its adherence from any aspect of public life.

Accordingly, special care must be taken by the Commission to understand that NCE organizations, particularly religious NCE entities and bodies, while qualified to hold a reserved license pursuant to Rules 73.503 and 73.621, may not for that reason be excluded from seeking, obtaining and maintaining unreserved broadcast licenses now awarded only by auction.<sup>5</sup> The imposition of such a disqualification -- based on the organizations profit versus nonprofit status alone -- would be discriminatory and impermissible. This is particularly so when a religious NCE is involved since they, like Trinity and its affiliates, may believe their educational, charitable and religious mission should be advanced through the broadcast media. *Cf. Church of Lukumi v. City of Hialeah*, 124 L.Ed.2d 472, 473 (1993) ("[A] law targeting religious [free exercise] as such is never permissible . . .").

Moreover, because NCE organizations, and religious NCE, are exempt from federal income taxes pursuant to 26 U.S.C. § 501(c)(3), which precludes commercial or for-profit operations, they could not simply form a for-profit subsidiary with which to seek an unreserved frequency. As stated in *Rosenberger*, "[i]t is axiomatic that the government may not regulate speech based on its substantive content [and] ... government offends the First Amendment when

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<sup>5</sup> This same rational applies equally to Part 74 applications and licenses (translators, LPTV and Class A TV stations) as well.

it imposes financial burdens on certain speakers based on the content of their expression.” 515 U.S. at 828

### **Conclusion**

Based on the foregoing, it is clear that the Commission must implement the Court’s determination in *NPR v. FCC* so as *not* to automatically exclude NCEs (especially religious NCEs) from competing for unreserved frequencies, regardless of the noncommercial nature of the service intended. An NCE organization may permissibly be excluded from obtaining an unreserved frequency only when it also makes the affirmative showing regarding operation of the station under Rules 73.503 and 73.621. To implement rules that automatically exclude NCE entities, whether they have ever sought a reserved frequency allocation or not, would be discriminatory and legally impermissible. The Commission’s new rules governing the award by auctioning of unreserved frequencies must therefore permit participation by NCE organizations not intending to operate such frequencies pursuant to a showing under the educational Rules.

Respectfully Submitted,

**Trinity Christian Center of Santa Ana, Inc.  
d/b/a Trinity Broadcasting Network**

By: \_\_\_\_\_

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April 15, 2002

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## **ATTACHMENT 1**

## TRINITY LIST OF AUTHORIZATIONS

### I. TRINITY CHRISTIAN CENTER OF SANTA ANA

<b>A.</b>	<b><u>Full Power</u></b>		<b><u>Facility ID No.</u></b>
1.	WTJP	Gadsden, Alabama	1002
2.	WMPV-TV	Mobile, Alabama	60827
3.	WMCF-TV	Montgomery, Alabama	60829
4.	KTBN	Santa Ana, California	67884
5.	WELF	Dalton, Georgia	60825
6.	WHSB	Monroe, Georgia	68058
7.	KAAB	Honolulu, Hawaii	3246
8.	WWTO-TV	LaSalle, Illinois	998
9.	WBUY	Holly Springs, Mississippi	60830
10.	KTAJ	St. Joseph, Missouri	999
11.	KNAT-TV	Albuquerque, New Mexico	993
12.	WDLI	Canton, Ohio	67893
13.	KDOR	Bartlesville, Oklahoma	1005
14.	WPGD	Hendersonville, Tennessee	60820
<b>B.</b>	<b><u>International Shortwave</u></b>		
1.	KTBN1	Salt Lake City, Utah	67913
<b>C.</b>	<b><u>TV Boosters</u></b>		
1.	KTBN1	Lake Arrowhead, California	91765
<b>D.</b>	<b><u>Low Power</u></b>		
1.	W51BY/W46CY	Birmingham, Alabama	990
2.	W22BF/W66DH	Decatur, Alabama	995
3.	W41BN/W23BY	Dothan, Alabama	67925
4.	W30BD	Eufaula, Alabama	58773
5.	W57BV	Florence, Alabama	986
6.	W67CO	Huntsville, Alabama	989
7.	W66CN	Jasper, Alabama	1012
8.	W18CD	Opelika, Alabama	60822
9.	W64BJ	Scottsboro, Alabama	67953
10.	W24CK	Selma, Alabama	60831
11.	W46BU	Tuscaloosa, Alabama	1008
12.	K20CZ/K61HA	Bullhead City, Arizona	67974
13.	K41ER	Globe, Arizona	67966
14.	K38CX	Shonto/Tonalea, Arizona	68020
15.	K42BS	Fayetteville, Arkansas	67933
16.	K27DI/K16ER	Fort Smith, Arkansas	67875
17.	K44EV	Hot Springs, Arkansas	60834
18.	K54ER	Jonesboro, Arkansas	60836

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
ATTACHMENT 1, Page 2**

19.	K43CJ	Mountain Home, Arkansas	68046
20.	K27FC	Paragould, Arkansas	60832
21.	K55CN	Bakersfield, California	67922
22.	K53FT	Chico/Paradise, California	68097
23.	K42DT	Coalinga, California	68091
24.	K26FO	Daggett, California	11529
25.	K60BB	Desert Hot Springs, California	67892
26.	K47EH	Eureka, California	67987
27.	K54DN	Lancaster, California	67901
28.	K33DK	Lucerne Valley, California	14153
29.	K28EM	Mariposa, California	67894
30.	K49EO	Modesto, California	68022
31.	K53DT	Monterey, California	68025
32.	K66BM	Palm Springs, California	68071
33.	K15CO	Porterville, California	68010
34.	K65DJ	Redding, California	68088
35.	K69FB	Sacramento, California	67970
36.	K15DB	Santa Barbara, California	67978
37.	K38EE	Twentynine Palms, California	67991
38.	K45DU	Ventura, California	67963
39.	K33BT	Victorville, California	67932
40.	K33DN/K48FW	Denver, Colorado	67997
41.	K66FB	Denver, Colorado	68001
42.	K25FZ	Grand Junction, Colorado	70103
43.	K48CG	Loveland, Colorado	68077
44.	W68CQ/W14CM	Dover, Delaware	67977
45.	W67BY/W38CO	Fort Myers, Florida	68028
46.	W23AQ	Lake City, Florida	68000
47.	W56DW	Naples, Florida	67888
48.	W68CM/W54CU	Panama City, Florida	67962
49.	W52CN/W17CK	Port Charlotte, Florida	67946
50.	W60BK/W36CO	St. Petersburg, Florida	67986
51.	W60CE	Sebring, Florida	67919
52.	W68CF	Tampa, Florida	68014
53.	W23AC/W61DF	Albany, Georgia	67944
54.	W65BI/W58CZ	Augusta, Georgia	67874

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
ATTACHMENT 1, Page 3**

55.	W33AL	Brunswick, Georgia	67887
56.	W52CL	Macon, Georgia	67972
57.	W55BM	Marietta, Georgia	68093
58.	W67BJ	Savannah, Georgia	68004
59.	W48BH	Statesboro, Georgia	43275
60.	W33BX	Tifton, Georgia	67931
61.	W25CP	Valdosta, Georgia	68034
62.	W54CW	Waycross, Georgia	67881
63.	K47BE	Boise, Idaho	68023
64.	K53FF	Coeur D'Alene, Idaho	67984
65.	K26EW	Idaho Falls, Idaho	68635
66.	K15DG	Pocatello, Idaho	67918
67.	K25EV	Twin Falls, Idaho	68096
68.	W22AJ	Arlington Heights, Illinois	68061
69.	W64BK/W51CT	Bloomington, Illinois	1007
70.	W58DA	Champaign, Illinois	68045
71.	W29BG	Decatur, Illinois	67930
72.	W29BN	Elgin, Illinois	67898
73.	W50BY/W53CB	Galesburg, Illinois	1013
74.	W36A0	Palatine, Illinois	68043
75.	W41BO	Peoria, Illinois	994
76.	W62BV/W25CL	Rockford, Illinois	988
77.	W52BI	Sterling-Dixon, Illinois	1006
78.	W18CF	Elkhart, Indiana	67973
79.	W38BK	Evansville, Indiana	68070
80.	W57DC	Lafayette, Indiana	68002
81.	W65BK/W43BV	Terre Haute, Indiana	68035
82.	K17ET	Cedar Rapids, Iowa	68067
83.	K61HD	Davenport, Iowa	68036
84.	K62FU	Muscatine, Iowa	47084
85.	K42AM	Ottumwa, Iowa	67883
86.	K44FK	Waterloo, Iowa	67879
87.	K43ER/K54GC	Independence, Kansas	1016
88.	K25DS	Junction City, Kansas	68005
89.	K31BW	Manhattan, Kansas	67975
90.	K15CN	Salina, Kansas	68040

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
ATTACHMENT 1, Page 4**

91.	K21AP/K55IL	Topeka, Kansas	68051
92.	K59DA	Wichita, Kansas	67886
93.	W33BK	Corbin, Kentucky	67968
94.	W65CX/W39CJ	Elizabethtown, Kentucky	21840
95.	W22CH	Hopkinsville, Kentucky	68049
96.	K64FT	Alexandria, Louisiana	28757
97.	K56DR/K58GB	Baton Rouge, Louisiana	67896
98.	K45DI	Mermentau, Louisiana	68069
99.	K59GI	Monroe, Louisiana	70101
100.	K49DE	New Iberia, Louisiana	67907
101.	K59DG	New Orleans, Louisiana	67939
102.	K59GO	Shreveport, Louisiana	67909
103.	W17BF/W36CK	Bangor, Maine	14333
104.	W17BJ	Danforth, Maine	14332
105.	W27CE	Dover/Foxcroft, Maine	14331
106.	W21BI	Farmington, Maine	14334
107.	W17BN	Madawaska, Maine	14336
108.	W14BO/W34CN	Medway, Maine	14335
109.	W51AG	Presque Isle, Maine	47483
110.	W47CL (CP)	York Center, Maine	67960
111.	W43BP	Cresaptown, Maryland	68024
112.	W67DF	Springfield, Massachusetts	67980
113.	W18BT	Alpena, Michigan	67049
114.	W66BV	Detroit, Michigan	67923
115.	K58CM	Duluth, Minnesota	67908
116.	K58BS	Minneapolis, Minnesota	67955
117.	K60DS	Rochester, Minnesota	67929
118.	K19BG	St. Cloud, Minnesota	68054
119.	W35BM	Biloxi, Mississippi	67942
120.	W25AD	Columbus, Mississippi	68080
121.	W25BA	Grenada, Mississippi	68056
122.	W33BH	Greenville, Mississippi	68089
123.	W36AC	McComb, Mississippi	68072
124.	W47CG	Meridian, Mississippi	67937
125.	W59DK	Natchez, Mississippi	67995
126.	W51CU	Pascagoula, Mississippi	67989

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
ATTACHMENT 1, Page 5**

127.	K56AU	Columbia, Missouri	67915
128.	K39CP	Poplar Bluff, Missouri	68030
129.	K49DG	Springfield, Missouri	68092
130.	K52DH/K41FQ	Springfield, Missouri	67916
131.	K34BR	St. Charles, Missouri	68065
132.	K18BT	St. Louis, Missouri	68055
133.	K53DW	Great Falls, Montana	67965
134.	K41CX	Helena, Montana	67928
135.	K26DD	Kalispell, Montana	67877
136.	K42EO	Missoula, Montana	68636
137.	K39AJ/K58GD	Lincoln, Nebraska	68083
138.	K52ES	Norfolk, Nebraska	68018
139.	K26CV	Ogallala, Nebraska	67899
140.	K19CU	Carson City, Nevada	67952
141.	K57FA	Las Vegas, Nevada	67876
142.	K45AV	Reno, Nevada	67920
143.	W36BJ	Atlantic City, New Jersey	68044
144.	K18CT	Raton, New Mexico	67943
145.	W64BH	Albany, New York	67927
146.	W23BS	Binghamton, New York	68003
147.	W59DG	Elmira, New York	68090
148.	W14AZ/W47CM	Glens Falls, New York	68052
149.	W10BH	Jamestown, New York	67957
150.	W22AZ	Olean, New York	68012
151.	W41AE/W51CV	Utica, New York	67994
152.	W52CW	Charlotte, North Carolina	67967
153.	W66DF	Fayetteville, North Carolina	68079
154.	W59BA/W63CW	Goldsboro, North Carolina	68074
155.	W60CV	Greenville, North Carolina	67904
156.	W22CJ	Jacksonville, North Carolina	68008
157.	W67DU	Lumberton, North Carolina	67940
158.	W64CN	Raleigh, North Carolina	68084
159.	W53BF	Rocky Mount, North Carolina	67783
160.	W66BT	Statesville, North Carolina	67958
161.	W51CW	Wilmington, North Carolina	67945
162.	K46DY	Bismarck, North Dakota	3164

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
ATTACHMENT 1, Page 6**

163.	K28EP	Dickinson, North Dakota	3160
164.	K56ET	Fargo, North Dakota	68013
165.	K49FF	Grand Forks, North Dakota	68048
166.	K40DE	Williston, North Dakota	68087
167.	W40AE/W59DL	Chillicothe, Ohio	67917
168.	W61DE	Cincinnati, Ohio	68075
169.	W51BI	Kirtland, Ohio	67934
170.	W32AR	Lexington, Ohio	68017
171.	W66CZ	Portsmouth, Ohio	68009
172.	W47BC	Springfield, Ohio	68026
173.	W39AI/W52CX	Youngstown, Ohio	68064
174.	W36AY/W16BT	Zanesville, Ohio	67988
175.	K44BQ	Ardmore, Oklahoma	68085
176.	K27AZ	Lawton, Oklahoma	67912
177.	K58EY/K25GJ	Muskogee, Oklahoma	1015
178.	K45ER	Tahlequah, Oklahoma	1014
179.	K33AG	Bend, Oregon	67951
180.	K33AO	Coos Bay, Oregon	68060
181.	K59DU	Grants Pass, Oregon	67992
182.	K58BG	Klamath Falls, Oregon	68063
183.	K21BC	Lakeview, Oregon	67979
184.	K57EK	Medford, Oregon	67959
185.	K14HA	Roseburg, Oregon	67903
186.	W41CF	Altoona, Pennsylvania	6340
187.	W48CH	Erie, Pennsylvania	68016
188.	W52BO	Meadville, Pennsylvania	68082
189.	W65CG	Pittsburgh, Pennsylvania	68062
190.	W39BT/W11BC	Williamsport, Pennsylvania	67954
191.	W18BF	Anderson, South Carolina	28783
192.	W19CH	Beaufort, South Carolina	68027
193.	W44AX	Charleston, South Carolina	67969
194.	W66BJ/W34CQ	Myrtle Beach, South Carolina	68021
195.	W55CQ	Orangeburg, South Carolina	70104
196.	K35FJ	Aberdeen, South Dakota	67964
197.	K38CQ	Huron, South Dakota	67905
198.	K27DB	Madison, South Dakota	67900

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
ATTACHMENT 1, Page 7**

199.	K33CO	Rapid City, South Dakota	68066
200.	K56GF	Sioux Falls, South Dakota	67998
201.	K31DP	Yankton, South Dakota	68006
202.	W57CZ	Cookeville, Tennessee	67990
203.	W35AH	Jackson, Tennessee	68047
204.	W60CF	Knoxville, Tennessee	68033
205.	W61DG	Morristown, Tennessee	67926
206.	W36AK	Nashville, Tennessee	60821
207.	K51CK	Abilene, Texas	68059
208.	K34FM	Austin, Texas	67880
209.	K26AP	Brownwood, Texas	67948
210.	K47ED	College Station, Texas	68029
211.	K57FC	Corpus Christi, Texas	67938
212.	K46DL/K56GE	Kingsville, Texas	67921
213.	K17BP	Palestine, Texas	68039
214.	K42DA	Paris, Texas	68081
215.	K44FJ	San Angelo, Texas	70099
216.	K20BW	San Antonio, Texas	68095
217.	K45FJ	San Antonio, Texas	68094
218.	K30EA	Texarkana, Texas	60814
219.	K15BV	Uvalde, Texas	68042
220.	K43DV	Victoria, Texas	68019
221.	K64CJ	Ogden, Utah	67891
222.	K39AK	Vernal, Utah	68053
223.	W16AL	Burlington, Vermont	67941
224.	W40BM	Lynchburg, Virginia	67890
225.	W49AP	Roanoke, Virginia	67996
226.	W24OI	Virginia Beach, Virginia	67889
227.	K23AS	Aberdeen, Washington	67956
228.	K55EB	Spokane, Washington	67936
229.	K34EM	Wenatchee, Washington	54348
230.	W45BW	Parkersburg, West Virginia	68037
231.	W49CB	Green Bay, Wisconsin	67885
232.	W19BH	Janesville, Wisconsin	68041
233.	W33AX/W38CT	Madison, Wisconsin	68073
234.	W17CF	Oshkosh, Wisconsin	67949

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
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235.	W16BS	Sheboygan, Wisconsin	67976
236.	W66DC	Waupaca, Wisconsin	67935
237.	K35CN	Green River, Wyoming	68031

**II. TRINITY BROADCASTING OF ARIZONA**

A.	<u>Full Powers:</u>		
1.	KPAZ	Phoenix, Arizona	67868
B.	<u>Low Powers</u>		
1.	K58AV	Cottonwood, Arizona	67871
2.	K35FH	Flagstaff, Arizona	67982
3.	K57BD	Tucson, Arizona	67911
4.	K56ED	Tucson, Arizona	67961

**III. TRINITY BROADCASTING OF DENVER**

A.	<u>Low Powers</u>		
1.	K57BT	Denver, Colorado	67872

**IV. TRINITY BROADCASTING OF FLORIDA, INC.**

A.	<u>Full Powers</u>		
1.	WHFT	Miami, Florida	67971

**V. TRINITY BROADCASTING OF INDIANA, INC.**

A.	<u>Full Powers</u>		
1.	WKOI	Richmond, Indiana	67869
2.	WCLJ	Bloomington, Indiana	68007

**VI. TRINITY BROADCASTING OF NEW YORK, INC.**

A.	<u>Full Powers</u>		
1.	WTBY	Poughkeepsie, New York	67993

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK  
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**VII. TRINITY BROADCASTING OF OKLAHOMA CITY, INC.**

- A. Full Powers  
1. KTBO Oklahoma City, OK 67999

**VIII. TRINITY BROADCASTING OF TEXAS**

**IX.**

- A. Full Powers  
1. KDTX Dallas, Texas 67910

**X. TRINITY BROADCASTING OF WASHINGTON**

- A. Full Powers  
1. KTBW Tacoma, Washington 67950